

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket Nos. 760 & 846

**CERTIFICATION OF COUNSEL REGARDING FIRST NOTICE
OF ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to Ann Aber in her capacity as Plan Administrator in the above-captioned cases (the “Plan Administrator”) hereby certifies as follows:

1. On April 28, 2025, the Debtors filed the *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 760] (the “First Assumption Notice”) regarding the assumption and assignment of certain unexpired leases set forth in the First Assumption Notice (the “Original Assumption List”). Attached to the First Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of the unexpired leases on the Original Assumption List.

2. The deadline to object to the First Assumption Notice was May 12, 2025 (the “Objection Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. On May 12, 2025, the landlord of store no. 2490 (the “Landlord”) filed the *Objection of CI Warner Robbins, LLC to First Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 846] (the “Objection”).

4. Attached as **Exhibit A** is a revised Assumption Order (the “Revised Assumption Order”), which the Landlord has confirmed resolves the Objection. A blackline comparing the Revised Assumption Order to the Assumption Order is attached hereto as **Exhibit B**.

5. Any leases subject to unresolved objections and informal comments received regarding the remaining balance of the leases included in the First Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the First Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases.

6. Accordingly, the Plan Administrator requests entry of the Revised Assumption Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

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Dated: August 13, 2025
Wilmington, Delaware

/s/ Jack M. Dougherty

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